

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:25-cv-22896-JEM

FRIENDS OF THE EVERGLADES, INC., a Florida not-for-profit corporation, and CENTER FOR BIOLOGICAL DIVERSITY, a 501(c)(3) nonprofit organization,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as Secretary of the UNITED STATES DEPARTMENT OF HOMELAND SECURITY; TODD LYONS, in his official capacity as Acting Director of the UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT; KEVIN GUTHRIE, in his official capacity as Executive Director of the Florida Division of Emergency Management; and MIAMI-DADE COUNTY, a political subdivision of the State of Florida,

Defendants.

PLAINTIFFS' NOTICE OF FILING NOTICE OF INTENT TO SUE

Plaintiffs hereby provide notice of the filing of Plaintiffs Friends of the Everglades and Center for Biological Diversity's July 11, 2025 "Notice of Violations of Endangered Species Act Sections 7 and 9, Clean Water Act Section 404, the National Park Service Organic Act, and Implementing Regulations, Relating to Federal and State Agencies' Actions in Furtherance of the Construction and Operation of a Mass Detention Center in the Everglades and Their Effects on Public Lands, Endangered and Threatened Species, and Clean Water," along with supporting

appendices A-H, a copy of which is attached as Exhibit 1 (the “Notice of Violation”). A copy of the Notice of Violation has been delivered to the addressees in the Notice.

Dated: July 16, 2025

Respectfully submitted,

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Counsel for Center for Biological Diversity

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 16, 2025, I electronically filed the foregoing with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record on the Service List below via transmission of Notice of Electronic Filing generated by CM/ECF.

s/ Paul J. Schwiep

Service List	
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	<p>Deputy Assistant Attorney General Environment and Natural Resources Division United States Department of Justice Hayley A. Carpenter Trial Attorney hayley.carpenter@usdoj.gov Natural Resources Section Ben Franklin Station P.O. Box 7611 Washington, D.C. 20044-7611 Telephone: (202) 305-0242</p> <p><i>Counsel for Kristi Noem, in her official capacity as Secretary, United States Department of Homeland Security, and Todd Lyons, in his official capacity as Acting Director, United States Immigration and Customs Enforcement</i></p>
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